

Exhibit F

From: [Starbuck, Emily](#)
To: [Patrick Trainor, Esq.](#)
Cc: [Mulherin, Joseph](#)
Subject: RE: D'Ambly - Electronic discovery parameters
Date: Thursday, December 15, 2022 3:34:36 PM
Attachments: [D'Ambly - Defendant's revisions - Plaintiff's FIRST SET OF Electronic Discovery SEARCH Parameters - 12.15.22.xlsx](#)

Hello Patrick,

Thank you for your response. In response to your email, our position is as follows:

- Time period – we are amenable to extending the time period to cover August 1, 2018 to September 30, 2019.
- Custodians – as agreed by the parties in our meet and confer last week, the proper custodians are the decision-makers that would have knowledge of D'Ambly's termination and separation agreement. At this time, the custodians listed are the decision-makers with the relevant knowledge. Should we become aware of additional custodians throughout our review of the clients' emails, we can discuss amending the list of custodians appropriately. However, pulling whole email boxes for additional custodians is unlikely to be necessary if the emails are captured from the current list of custodians. For example, Jean Nechvatal would be included on emails to/from other HR employees obviating the need to pull her subordinates' email boxes. As promised, NYDN is in the process of pulling the email boxes for these custodians for the relevant period.
- Search terms – we have reviewed your additional proposed search terms. In the attached, we have outlined our objections to the terms that are irrelevant, disproportionate, and/or overly broad for purposes of the case as currently constituted.
 - We note that many of the terms appear to be aimed at claims that have been dismissed or matters that are not relevant.
 - Additionally, other terms such as "working", "employing", "print shop", "Teamsters" without limitation will bring up thousands of irrelevant emails that would be overly burdensome to sort through.
 - We discussed in our meet and confer that D'Ambly's name is quite unique, so we believe that any responsive, relevant emails will be picked up by searching a combination of his name, Exoo, and/or NJEHA.

We will send you a link tomorrow with our first rolling production. Once we have the custodians' email boxes, we will immediately begin our review and supplementation.

Per usual, we are happy to discuss our objections to the additional search terms. We have availability tomorrow or Monday.

Best,
Emily

Search Terms	Custodians	Time Period							
"Christian Exoo"	Jimmy Brill	August 1, 2018 to September 30, 2019							
Antifashgordon	Ed Bushey								
@Antifashgordon	Toni Martinez								
Exoo	Jean Nechvatal								
Christian Exoo	George Martin								
"Chris Exoo"									
"Daniel D'Ambly"									
"Dan D'Ambly"									
D'Ambly									
"Daniel Dambly"									
Dan Dambly									
Dambly									
"New Jersey European Heritage Association"									
NJEHA									
Doxed OR Doxing OR Dox									
Nazi									overbroad, disproportionate and unduly burdensome - emails with these terms relevant to D'Ambly, if any, would be picked up by his name
Fascist									overbroad, disproportionate and unduly burdensome - emails with these terms relevant to D'Ambly, if any, would be picked up by his name
Facist									overbroad, disproportionate and unduly burdensome - emails with these terms relevant to D'Ambly, if any, would be picked up by his name
Racist									overbroad, disproportionate and unduly burdensome - emails with these terms relevant to D'Ambly, if any, would be picked up by his name
"White Supremacists"									overbroad, disproportionate and unduly burdensome - emails with these terms relevant to D'Ambly, if any, would be picked up by his name
"White supremacist"									overbroad, disproportionate and unduly burdensome - emails with these terms relevant to D'Ambly, if any, would be picked up by his name
working									overbroad, disproportionate and unduly burdensome - emails with these terms relevant to D'Ambly, if any, would be picked up by his name
employ									overbroad, disproportionate and unduly burdensome - emails with these terms relevant to D'Ambly, if any, would be picked up by his name
Teamsters									overbroad, disproportionate and unduly burdensome - emails with these terms relevant to D'Ambly, if any, would be picked up by his name
@Teamsters									overbroad, disproportionate and unduly burdensome - emails with these terms relevant to D'Ambly, if any, would be picked up by his name
"Jersey Goyz 14"									overbroad, disproportionate and unduly burdensome - emails with these terms relevant to D'Ambly, if any, would be picked up by his name
"Jersey Goyz"									overbroad, disproportionate and unduly burdensome - emails with these terms relevant to D'Ambly, if any, would be picked up by his name
employing									overbroad, disproportionate and unduly burdensome - emails with these terms relevant to D'Ambly, if any, would be picked up by his name
holocaust									overbroad, disproportionate and unduly burdensome - emails with these terms relevant to D'Ambly, if any, would be picked up by his name
@slpng_giants									irrelevant, overly broad in scope and disproportionate to the needs of the case in light of the claims alleged
printer									overbroad, disproportionate and unduly burdensome - emails with these terms relevant to D'Ambly, if any, would be picked up by his name
"Jersey City"									overbroad, disproportionate and unduly burdensome - emails with these terms relevant to D'Ambly, if any, would be picked up by his name
Teamsters									overbroad, disproportionate and unduly burdensome - emails with these terms relevant to D'Ambly, if any, would be picked up by his name
Nazis									overbroad, disproportionate and unduly burdensome - emails with these terms relevant to D'Ambly, if any, would be picked up by his name
hate									overbroad, disproportionate and unduly burdensome - emails with these terms relevant to D'Ambly, if any, would be picked up by his name
"hate group"									overbroad, disproportionate and unduly burdensome - emails with these terms relevant to D'Ambly, if any, would be picked up by his name
"Titus D'Andrea"									overbroad, disproportionate and unduly burdensome - emails with these terms relevant to D'Ambly, if any, would be picked up by his name
Dayton									irrelevant, overly broad in scope and disproportionate to the needs of the case in light of the claims alleged
@NYDailyNews									overbroad, disproportionate and unduly burdensome - emails with these terms relevant to D'Ambly, if any, would be picked up by his name
212-210-2100									overbroad, disproportionate and unduly burdensome - emails with these terms relevant to D'Ambly, if any, would be picked up by his name
"print shop"									overbroad, disproportionate and unduly burdensome - emails with these terms relevant to D'Ambly, if any, would be picked up by his name
201-356-6923									overbroad, disproportionate and unduly burdensome - emails with these terms relevant to D'Ambly, if any, would be picked up by his name
201-356.6923									overbroad, disproportionate and unduly burdensome - emails with these terms relevant to D'Ambly, if any, would be picked up by his name
(201) 946-6000									overbroad, disproportionate and unduly burdensome - emails with these terms relevant to D'Ambly, if any, would be picked up by his name
"printing facilities"									overbroad, disproportionate and unduly burdensome - emails with these terms relevant to D'Ambly, if any, would be picked up by his name
"bootlicking nazi"									irrelevant, overly broad in scope and disproportionate to the needs of the case in light of the claims alleged
"white nationalist"									irrelevant, overly broad in scope and disproportionate to the needs of the case in light of the claims alleged

Search Terms	Custodians	Time Period							
@dianontjenkins	irrelevant, overly broad in scope and disproportionate to the needs of the case in light of the claims alleged								
"Daryle Lamont Jenkins"	irrelevant, overly broad in scope and disproportionate to the needs of the case in light of the claims alleged								
"that scab"	irrelevant, overly broad in scope and disproportionate to the needs of the case in light of the claims alleged								
"anti racist history"	irrelevant, overly broad in scope and disproportionate to the needs of the case in light of the claims alleged								
"neo nazis"	overbroad, disproportionate and unduly burdensome - emails with these terms relevant to D'Ambly, if any, would be picked up by his name								
"neo-nazis"	overbroad, disproportionate and unduly burdensome - emails with these terms relevant to D'Ambly, if any, would be picked up by his name								
"neo nazi"	overbroad, disproportionate and unduly burdensome - emails with these terms relevant to D'Ambly, if any, would be picked up by his name								
"neo-nazi"	overbroad, disproportionate and unduly burdensome - emails with these terms relevant to D'Ambly, if any, would be picked up by his name								
"judd legum"	irrelevant, overly broad in scope and disproportionate to the needs of the case in light of the claims alleged								
"kill Jewish people"	irrelevant, overly broad in scope and disproportionate to the needs of the case in light of the claims alleged								
@nycantifa	irrelevant, overly broad in scope and disproportionate to the needs of the case in light of the claims alleged								
"Make Dan's Face into a Tomato Again"	irrelevant, overly broad in scope and disproportionate to the needs of the case in light of the claims alleged								
"holocaust denying Nazi"	irrelevant, overly broad in scope and disproportionate to the needs of the case in light of the claims alleged								
"Kit O'Connell"	irrelevant, overly broad in scope and disproportionate to the needs of the case in light of the claims alleged								
"European heritage"	irrelevant, overly broad in scope and disproportionate to the needs of the case in light of the claims alleged								
@shaunking	overbroad, disproportionate and unduly burdensome - duplicative of NJEHA terms above								
"Martha Friend"	irrelevant, overly broad in scope and disproportionate to the needs of the case in light of the claims alleged								
@fivesibs3	irrelevant, overly broad in scope and disproportionate to the needs of the case in light of the claims alleged								
"contact the @NYDailyNews"	irrelevant, overly broad in scope and disproportionate to the needs of the case in light of the claims alleged								
"they kick puppies."	irrelevant, overly broad in scope and disproportionate to the needs of the case in light of the claims alleged								
"Fire neo-Nazi"	irrelevant, overly broad in scope and disproportionate to the needs of the case in light of the claims alleged								
"Dan D'Ambly of @NYDailyNews"									
Daryl Lamont Jenkins	irrelevant, overly broad in scope and disproportionate to the needs of the case in light of the claims alleged								
Oren Segal	irrelevant, overly broad in scope and disproportionate to the needs of the case in light of the claims alleged								
"Oren Segal	irrelevant, overly broad in scope and disproportionate to the needs of the case in light of the claims alleged								
ADL	irrelevant, overly broad in scope and disproportionate to the needs of the case in light of the claims alleged								
"anti defamation league"	irrelevant, overly broad in scope and disproportionate to the needs of the case in light of the claims alleged								
"anti-defamation league"	irrelevant, overly broad in scope and disproportionate to the needs of the case in light of the claims alleged								
Mark Pincavage	irrelevant, overly broad in scope and disproportionate to the needs of the case in light of the claims alleged								
"Mark Pincavage"	irrelevant, overly broad in scope and disproportionate to the needs of the case in light of the claims alleged								
SPLC	irrelevant, overly broad in scope and disproportionate to the needs of the case in light of the claims alleged								
"Southern Poverty Law Center"	irrelevant, overly broad in scope and disproportionate to the needs of the case in light of the claims alleged								
"Nick Penniman"	irrelevant, overly broad in scope and disproportionate to the needs of the case in light of the claims alleged								
"Andy Campbell"	irrelevant, overly broad in scope and disproportionate to the needs of the case in light of the claims alleged								
"Huffington Post"	irrelevant, overly broad in scope and disproportionate to the needs of the case in light of the claims alleged								
"Huffpo"	irrelevant, overly broad in scope and disproportionate to the needs of the case in light of the claims alleged								
"any violence or blood spilled"									
@ADL National	irrelevant, overly broad in scope and disproportionate to the needs of the case in light of the claims alleged								
@splcenter	irrelevant, overly broad in scope and disproportionate to the needs of the case in light of the claims alleged								